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March 3, 2014

## **Via ECF and E-Mail**

The Honorable Richard J. Sullivan United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square Courtroom 905 New York, New York 10007

Re: United States v. Todd Newman and Anthony Chiasson, S2 12 CR 121 (RJS)

## Dear Judge Sullivan:

As your Honor is aware, I represent Anthony Chiasson in the above-captioned matter. Mr. Chiasson seeks the Court's permission to travel with his wife and two young children to Miami, Florida on Monday, March 17, 2014, and from there to Naples, Florida on Sunday, March 23, 2014. The Chiasson family will return to New York on Friday, March 28, 2014.

Mr. Chiasson and his family will stay in hotels to be determined within the cities of Miami and Naples. Mr. Chiasson will provide hotel details as soon as they are available if the Court requires such information. Mr. Chiasson will have his cellular telephone with him at all times and thus can be reached at (917) 572-3830.

I have been informed that the United States Attorney's Office for the Southern District of New York and the United States Probation Office have no objection to Mr. Chiasson's travel request.

The Honorable Richard J. Sullivan March 3, 2014 Page 2 of 2

I am available at the Court's convenience should it require further discussion of this request.

Respectfully,

/s

Gregory Morvillo

cc: Assistant U.S. Attorney Antonia Apps (via e-mail)
U.S. Pretrial Services Officer Nichole Brown-Morin (via e-mail)